

# **Exhibit 1**



January 2, 2026

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***Co-Lead Counsel for MDL Plaintiffs***

***Co-Lead Counsel for JCCP  
Plaintiffs***

Re: *In Re: Uber Rideshare Cases*, JCCP No. 5188; and *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation, MDL 3084*

Dear Counsel:

On behalf of our clients, Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, "Defendants"), we are clawing back and re-producing via secure file transfer portal documents inadvertently produced. This privilege clawback is made pursuant to the Stipulation and Protective Order issued in the JCCP on March 6, 2025, the MDL Protective Order (ECF 176), PTO 14 (ECF 396), and in accordance with PTO 16 (ECF 866). The Bates number, privilege log number, and production volume of the privileged documents are listed below.

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Beginning Bates – Ending Bates	JCCP_MDL Priv Log No.	Prod. Volume
UBER_JCCP_MDL_000257549 - UBER_JCCP_MDL_000257551	Forthcoming	JCCP_MDL001
UBER_JCCP_MDL_000909003	Forthcoming	JCCP_MDL017; JCCP_MDL125
UBER_JCCP_MDL_002992877	Forthcoming	JCCP_MDL095
UBER_JCCP_MDL_004999440 - UBER_JCCP_MDL_004999443	Forthcoming	JCCP_MDL166
UBER_JCCP_MDL_001090657 - UBER_JCCP_MDL_001090678	JCCP_MDL_PRIVLOG038388	JCCP_MDL023
UBER_JCCP_MDL_003726658 - UBER_JCCP_MDL_003726664	Forthcoming	JCCP_MDL135
UBER_JCCP_MDL_005696274 - UBER_JCCP_MDL_005696276	Forthcoming	JCCP_MDL235
UBER_JCCP_MDL_005696277 - UBER_JCCP_MDL_005696278	Forthcoming	JCCP_MDL235
UBER_JCCP_MDL_005696279 - UBER_JCCP_MDL_005696280	Forthcoming	JCCP_MDL235
UBER_JCCP_MDL_005696281 - UBER_JCCP_MDL_005696282	Forthcoming	JCCP_MDL235
UBER_JCCP_MDL_005696283 - UBER_JCCP_MDL_005696284	Forthcoming	JCCP_MDL235
UBER_JCCP_MDL_005696285	Forthcoming	JCCP_MDL235
UBER_JCCP_MDL_004201586 - UBER_JCCP_MDL_004201590	Forthcoming	JCCP_MDL155
UBER_JCCP_MDL_002057225 - UBER_JCCP_MDL_002057342	JCCP_MDL_PRIVLOG061851	JCCP_MDL057
UBER_JCCP_MDL_004212106 - UBER_JCCP_MDL_004212127	Forthcoming	JCCP_MDL155

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UBER_JCCP_MDL_002059181	Forthcoming	JCCP_MDL057
UBER_JCCP_MDL_000158091 - UBER_JCCP_MDL_000158092	Forthcoming	UBER023
UBER_JCCP_MDL_002473662	Forthcoming	JCCP_MDL069
UBER_JCCP_MDL_002735065 - UBER_JCCP_MDL_002735069	Forthcoming	JCCP_MDL079
UBER_JCCP_MDL_001102563	Forthcoming	JCCP_MDL023
UBER_JCCP_MDL_000045899	Forthcoming	UBER018
UBER_JCCP_MDL_005266819 - UBER_JCCP_MDL_005266821	Forthcoming	JCCP_MDL197
UBER_JCCP_MDL_000535001 - UBER_JCCP_MDL_000535003	JCCP_MDL_PRIVLOG007785	JCCP_MDL008
UBER_JCCP_MDL_002315507	Forthcoming	JCCP_MDL075
UBER_JCCP_MDL_002315575 - UBER_JCCP_MDL_002315683	Forthcoming	JCCP_MDL075
UBER_JCCP_MDL_003945059 - UBER_JCCP_MDL_003945067	Forthcoming	JCCP_MDL112
UBER_JCCP_MDL_000184573	Forthcoming	UBER025
UBER_JCCP_MDL_003755190	Forthcoming	JCCP_MDL135
UBER_JCCP_MDL_005031659	Forthcoming	JCCP_MDL166
UBER_JCCP_MDL_001467288	Forthcoming	JCCP_MDL039
UBER_JCCP_MDL_005676090 - UBER_JCCP_MDL_005676091	Forthcoming	JCCP_MDL233
UBER_JCCP_MDL_001699650	Forthcoming	JCCP_MDL048

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UBER_JCCP_MDL_001534042 - UBER_JCCP_MDL_001534428	Forthcoming	JCCP_MDL039
UBER_JCCP_MDL_001563271 - UBER_JCCP_MDL_001563274	Forthcoming	JCCP_MDL039
UBER_JCCP_MDL_002286376 - UBER_JCCP_MDL_002286379	Forthcoming	JCCP_MDL063
UBER_JCCP_MDL_002184840 - UBER_JCCP_MDL_002184844	Forthcoming	JCCP_MDL057
UBER_JCCP_MDL_005176144	Forthcoming	JCCP_MDL190
UBER_JCCP_MDL_002655853	Forthcoming	JCCP_MDL078
UBER_JCCP_MDL_002657950	Forthcoming	JCCP_MDL078
UBER_JCCP_MDL_003046461 - UBER_JCCP_MDL_003046574	JCCP_MDL_PRIVLOG073012	JCCP_MDL101
UBER_JCCP_MDL_002262778 - UBER_JCCP_MDL_002262796	Forthcoming	JCCP_MDL057
UBER_JCCP_MDL_003077777 - UBER_JCCP_MDL_003077781	Forthcoming	JCCP_MDL101
UBER_JCCP_MDL_003292945 - UBER_JCCP_MDL_003292951	Forthcoming	JCCP_MDL111
UBER_JCCP_MDL_003212294 - UBER_JCCP_MDL_003212358	Forthcoming	JCCP_MDL101
UBER_JCCP_MDL_003212951	Forthcoming	JCCP_MDL101
UBER_JCCP_MDL_003628483	Forthcoming	JCCP_MDL132

Defendants did not waive their privilege claim by the inadvertent production of this privileged material, and make this privilege clawback pursuant to the Stipulation and Protective Order issued in the JCCP on March 6, 2025, Federal Rule of Civil Procedure 26 (b)(5)(B), the MDL Protective Order (ECF 176), and Stipulated Pretrial Order No. 14: Federal Rule of Evidence 502 (D) and Privilege Materials (ECF 396).

In accordance with Section 11 of the JCCP Stipulation and Amended Protective Order entered on March 6, 2025, Defendants demand that JCCP Plaintiffs

and their counsel take the following immediate steps as required by the Order: (1) use reasonable efforts to destroy or sequester all copies of the inadvertently produced document and associated metadata in their possession, custody, or control and notify Defendants when they have done so; and (2) take reasonable steps to retrieve and destroy or sequester the inadvertently produced privileged material and associated metadata from other persons, if any, to whom such privileged document and associated metadata has been provided, and notify Defendants when they have done so.

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Likewise, pursuant to Section 11 of MDL Protective Order (ECF 176), Federal Rule of Civil Procedure 26 (b)(5)(B), and Stipulated Pretrial Order No. 14: Federal Rule of Evidence 502 (D) and Privilege Materials (ECF 396), Defendants demand that MDL Plaintiffs and their counsel take the following immediate steps: (1) sequester, destroy, or return the inadvertently produced document and associated metadata, and all copies thereof, as well as any analyses, memoranda, or notes or portions thereof which were internally generated and contain or were based upon the privileged materials identified in this letter; (2) not use or disclose the information for any purpose except contesting the assertion of privilege; (3) take reasonable steps to retrieve the information if you disclosed it before being notified; and (4) notify Defendants when they have taken these steps.

We will be re-producing the documents at issue with privilege slipsheets and/or redactions via secure file transfer portal. Per the agreement of the parties in the JCCP and MDL, Defendants are making a single production in both actions, with the Bates prefix of UBER\_JCCP\_MDL.

Defendants reserve their right to seek further relief concerning this matter as provided in the relevant court orders, rules, or statutes. Defendants also reserve the right to amend, supplement, correct, or modify the information contained herein and in the associated documents, if and as we obtain additional information.

Sincerely,



Michael B. Shortnacy  
Partner

*Counsel for Defendants*  
*Uber Technologies, Inc., Rasier LLC, and Rasier-CA LLC*



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